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Attorneys for John Alvarez, Sr.

**United States District Court**  
**Eastern District of California**

John Alvarez, Senior,

Plaintiff,

vs.

Yosemite Hospitality, LLC;  
Et.al.,

Defendants.

Case Number: 1:22-cv-1228 JLT EPG

NOTICE OF MOTION AND MOTION  
FOR REMAND  
[28 U.S.C. § 1447(c)]

Date: November 27, 2022  
Time: 9:00 A.M.

Courtroom: 4 Hon. Jennifer L.  
Thurston, United States District Judge  
Trial Date: TBD

To defendants Yosemite Hospitality, LLC and Aramark Uniform & Career  
Apparel Group Inc., and to their attorney of record:

PLEASE TAKE NOTICE that on November 28, 2022 at the hour of 9:00 A.M., or at such later time as the court may direct in the courtroom of the Honorable Jennifer L. Thurston, United States District Judge, to wit Courtroom 4, 7<sup>th</sup> Floor of the above-entitled court, plaintiff John Alvarez, Sr.'s motion to remand this matter to the Superior Court of California, County of Mariposa for all further proceedings will be heard by the court.

The grounds for this motion are that the removal of this matter was not within the 30 day period prescribed in 28 U.S.C. § 1446(b)(1) following service as acknowledged in the documents supporting removal filed in the above-entitled matter.

This motion is be made on this notice of motion, the memorandum in support of that motion served and filed herewith, upon the declaration of William A. Romaine in support of the motion to remand served and filed herewith, and upon all evidence admitted by the court, including, but not limited to the documents on file in the above-entitled matter, whether or not that evidence was admitted prior to, as part of, or subsequent to the filing of this motion.

Dated: October 25, 2022

Romaine Lokhandwala Law Group, LLP, by:

\_\_\_\_\_/s/ William A. Romaine  
William A. Romaine, Attorneys for Plaintiff.

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